

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**MOTION TO INFORM AMERINATIONAL COMMUNITY SERVICES, LLC'S  
APPEARANCE AT THE JUNE 12 -13, 2019 OMNIBUS HEARING**

COMES NOW AmeriNational Community Services, LLC (hereafter "AmeriNat") as servicer for the GDB Debt Recovery Authority (the "DRA") authorized to pursue and enforce the DRA's rights and remedies in any legal proceeding, including the DRA's participation as a creditor in the instant Title III case, by and through the undersigned legal counsel, and respectfully submits this motion in compliance with the Court's *Order Regarding Procedures for Attendance, Participation and Observation of June 12-13, 2019 Omnibus Hearing* (the "Scheduling Order") (Dkt. No. 7196):

1. Nayuan Zouairabani of McConnell Valdés, LLC will appear in person on behalf of AmeriNat at the omnibus hearing beginning on June 12, 2019 at 9:30 A.M. in Courtroom 3 of the

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico ("Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

United States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico 00918-1767 (the “Hearing”), to present oral argument regarding:

- a. *The Omnibus Motion by Official Committee of Unsecured Creditors, Financial Oversight and Management Board, and Its Special Claims Committee to Extend Time for Service of Summonses and Complaints and to Stay Certain Adversary Proceedings [Adv. Nos. 19-362, 19-363, 19-364, 19-365] Relating to Certain HTA Bonds* (Dkt. No. 7060);
- b. *The Limited Response And Reservation Of Rights To Omnibus Motion By Official Committee Of Unsecured Creditors, Financial Oversight And Management Board, And Its Special Claims Committee To Extend Time For Service Of Summonses And Complaints And To Stay Certain Adversary Proceedings [Adv. Nos. 19-362, 19-363, 19-364, 19-365] Relating To Certain HTA Bonds* (Dkt. No. 7122);
- c. *The Omnibus Reply of Official Committee of Unsecured Creditors, Financial Oversight and Management Board, and Its Special Claims Committee in Support of Motions to Extend Time for Service of Summonses and Complaints and to Stay Certain Adversary Proceedings Relating to Certain Challenged GO Bonds, Certain HTA Bonds, And Certain ERS Bonds* (Dkt. 7223);
- d. *The Urgent Motion of Assured Guaranty Corp. to Compel Compliance by the Official Committee of Unsecured Creditors with Federal Rule of Bankruptcy Procedure 2019 and to Amend the Eighth Amended Case Management Procedures* (Dkt. No. 6963);

- e. *The Joinder to Urgent Motion of Assured Guaranty Corp. and Assured Guaranty Municipal Corp. to Compel Compliance with the Official Committee of Unsecured Creditors with Federal Rule of Bankruptcy Procedure 2019 and to Amend the Eighth Amended Case Management Procedures* (Dkt. 7094);
- f. *The Objection of Official Committee of Unsecured Creditors to Motion of Assured Guaranty Corp. and Assured Guaranty Municipal Corp. to Compel Compliance by Official Committee of Unsecured Creditors with Federal Rule of Bankruptcy Procedure 2019 and to Amend Eighth Amended Case Management Procedures* (Dkt. 7098); and
- g. *The Reply of Assured Guaranty Corp. and Assured Guaranty Municipal Corp. in Support of Motion to Compel Compliance by the Official Committee of Unsecured Creditors with Federal Rule of Bankruptcy Procedure 2019 and to Amend the Eighth Amended Case Management Procedures* (Dkt. 7188).

2. AmeriNat reserves the right to respond, as necessary, to any statements made at the Hearing in connection with the above-referenced pleadings or otherwise made by any party as to any related matters of the instant Title III case.

**WHEREFORE**, AmeriNat respectfully requests the Court to take note of the foregoing, and deem AmeriNat in compliance with the Scheduling Order (Dkt. 7196).

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 6<sup>th</sup> day of June, 2019.

**MCCONNELL VALDÉS LLC**

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**WE HEREBY CERTIFY** that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all CM/ECF participants in this case. We further certify that, on this same date, we served the foregoing upon all the Standard Parties as identified and defined at ¶ II(A) of the Court's *Order Establishing Case Management Procedures* (Docket No. 40), as amended and clarified (Dockets No. 262, 1065, 1512, 2839, 3730, 3804, 4866, and 7115 of Case No. 17-03283 (LTS))